

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 25, 2023

BY ECF

The Honorable Judge Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Morrow-Wu et al
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

I write to respectfully request that the Court modify Mr. Morrow-Wu's bond to allow the Pretrial Services Agency the discretion to set the duration of Mr. Morrow-Wu's travel to the Southern District of New York for medical appointments and meetings with counsel.¹

On June 7, 2023, your Honor ordered Mr. Morrow-Wu released to home detention at his sister's residence in Oneida, Tennessee subject to a \$75,000 personal recognizance bond secured by his sister's vehicle, cosigned by two financially responsible persons, Pretrial supervision, travel restricted to the Eastern District of Tennessee and Southern Eastern Districts of New York, and the surrender of travel documents with no new applications. On August 1, your Honor modified Mr. Morrow-Wu's conditions of release to permit his travel to New York City for medical appointments, with permission to remain in New York City or New Jersey overnight. Mr. Morrow-Wu has been compliant with all conditions of release.

A modification of Mr. Morrow-Wu's travel conditions is necessary to ensure that Mr. Morrow-Wu has adequate recovery time after his medical procedures in New York and to ensure that Mr. Morrow-Wu is obligated to travel by air or car only when he is medically well enough to do so. Mr. Morrow-Wu is undergoing cancer treatment, specifically immunotherapy treatment, at Mount Sinai's Cancer Center. Ex. A- Schedule of Upcoming Treatment Appointments. The current bail conditions require Mr. Morrow-Wu to return to the Eastern District of Tennessee, his current district of residence, within one day of receiving treatment whether or not he is well enough and able to do so safely.

I respectfully ask the Court to remove the overnight limitation on Mr. Morrow-Wu's travel to New York for medical treatment, and allow Pretrial, in consultation with Mr. Morrow-Wu and his medical providers, to set the duration of his travel to New York.

¹ Undersigned counsel requested the positions of the Government and Pretrial on Monday, October 23, but has yet to receive a response.

October 24, 2023

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Thank you for your consideration of this request.

Respectfully submitted,

/s/

Zawadi S. Baharanyi

Assistant Federal Defender

(917) 612-2753

cc: AUSA Jerry Fang
USPSO Shauna McCullough-Walker

SO ORDERED:



HONORABLE ALVIN K. HELLERSTEIN

United States District Judge

10-25-23

Name: Matthew B Wu | DOB: 4/28/1984 | MRN: H336117 | PCP: | Legal Name: Matthew B Wu

Appointments and Visits

Upcoming Visits

Future Visits ☐

10/09/2023 12:00 P.M.

Cancer Center

Mount Sinai-Union Square

10 Union Square East, Suite 4A,
New York, NY 10003

Purpose of Visit: IV Immunotherapy (See
Provider Instructions for this visit)

10/09/2023 3:30 P.M.

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NEW YORK NY 10003

Purpose of Visit: Allergy Consult

11/03/2023 12:00 P.M.

Cancer Center

Mount Sinai-Union Square

10 Union Square East, Suite 4A,
New York, NY 10003

Purpose of Visit: IV Immunotherapy (See
Provider Instructions for this visit)

10/18/2023 12:00 P.M.

Cancer Center

Mount Sinai-Union Square

10 Union Square East, Suite 4A,
New York, NY 10003

Purpose of Visit: IV Immunotherapy (See
Provider Instructions for this visit)

10/27/2023 12:00 P.M.

Cancer Center

Mount Sinai-Union Square

10 Union Square East, Suite 4A,
New York, NY 10003

Purpose of Visit: IV Immunotherapy (See
Provider Instructions for this visit)

11/13/2023 12:00 P.M.

Cancer Center

Mount Sinai-Union Square

10 Union Square East, Suite 4A,
New York, NY 10003

Purpose of Visit: IV Immunotherapy (See
Provider Instructions for this visit)

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